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## IRECO Incorporated

Eleventh Floor Crossroads Tower  
Salt Lake City, Utah USA 84144  
Telephone: (801) 364-4800  
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MAY 12 1988

## RCRA Implementation Branch

16 March 1988

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March 16, 1988

Bureau of Solid and Hazardous Waste  
Utah Department of Health  
288 North 1460 West  
Salt Lake City, Utah 84116Utah Dept. of Health  
Bureau of Solid & Hazardous Waste

Attention: Ms. Susan Toronto 801-538-670

Re: Resubmittal of Closure Plan, Lehi Plant, Site A, EPA I.D.  
No. UTD070546445

Dear Ms. Toronto:

In response to the letter dated January 13, 1988 (BSHW-5476-1) and subsequent phone conversation with Steve Hamilton, enclosed is the revised Closure Plan for Lehi Plant, Site A. The plan now includes a map with dimensions of the burning ground area. In addition, a Chain of Custody Form and Procedure has been incorporated into the plan.

Currently, there does not exist either a certified test method or a certified laboratory that will analyze for reactivity-detonation. The EPA's SW846 definition of reactivity is a paraphrased, narrative definition originating with the National Fire Protection Association (NFPA). The NFPA defines an explosive material as "any explosive material that can be detonated by means of a No. 8 blasting cap or its equivalent." SW846 defines an explosive material as "solid materials which contain no liquid ingredient and which can be detonated, when unconfined, by means of No. 8 test blasting cap." IRECO's proposed test method 7.5 meets and exceeds the requirements set forth by the NFPA and SW846. IRECO proposes using a 10-gram booster which contains more explosive than a No. 8 blasting cap, in the attempts to initiate the residue. Thus, the samples will be subjected to a stronger initiating force than the No. 8 cap suggested in SW846 and NFPA publication.

In response to sampling and testing the burn area for metals, IRECO's hazardous waste products, burned at the Site A burn pit, did not contain metals and thus cannot be a source of

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contamination. Sampling and testing for metals is unnecessary and would only impose an additional financial burden for IRECO.

We would like to extend an invitation to the Bureau to observe our sampling and testing the burn pit residue. Please advise us of your comments and schedule for public notice. If you have questions, please contact me at the plant or contact Bruce Venable, Environmental Specialist at 364-4800.

Sincerely yours,

IRECO Incorporated



Clark D. Bonner  
Plant Manager

CDB:mls

Encls.